

## Data Integrity

### ❖ KPMG's audits do not demonstrate that BellSouth's data are reliable and accurate

- Audit progress
  - Replication
  - Integrity
  - SEEM

- DOJ Comments

*BellSouth relies heavily on KPMG's Revised Interim Status Report on the Georgia metrics audit as support for the accuracy of its data...the KPMG report is useful...but it offers no conclusions regarding the reliability of BellSouth's metrics because it was not suited for that purpose. (Page 19)*

*The number of open exceptions and unsatisfied test criteria in past phases do not provide a basis for predicting that other significant issues will not be discovered during the third phase. Moreover, BellSouth has made many systems changes since the first two phases of the audit which affect the majority of the metrics. (Page 19)*

- Open observations and exceptions

### ❖ BellSouth has not resolved AT&T's data integrity issues

### ❖ BellSouth's performance measures remain inadequate

- Workshop issue implementation

### ❖ The lack of re-postings does not demonstrate the stability of BellSouth's data

- Numerous examples exist of data that should have been reposted.
- DOJ Comments

*In and of itself, however, this reduced number of restatements is not proof that the underlying problems that led to the former pattern of restatements have been resolved or that the current data are accurate. (Page 19)*

## Open Data Integrity Issues Update

Issue	February Status	March Status
Completion notices for orders completed in one month, but notice provided in another	Not corrected, promised for April 2002 data.	No change
Lack of completion notice for orders submitted directly in SOC's.	Not resolved. Conflicting information from BellSouth	No change
AT&T's orders missing from completion notice data.	Stand-alone LNP orders missing. (To be corrected with January data)  Project Orders missing from report and raw data (To be corrected with January data)	AT&T still missing orders in data.
Use of incorrect information to calculate jeopardy notice.	To be corrected with January 2002 data.	Not corrected—see information with Georgia exception status.
Missing acknowledgements from measurements data.	Not resolved—pre-order issues and EDI envelope issue..	No change.
Lack of LSR detail for LNP flow-through report. (Measure O-6)	Promised but not provided.	1 <sup>st</sup> report provided on 3/21. Unable to verify accuracy until flow-through report keys are provided.
Exclusion of directory listing orders.	BellSouth has re-instated to ordering measures, however, it does not provide the raw data for provisioning measures.	No change
Exclusion of LSRs classified as projects.	Continues to refuse to provide raw data so that accuracy of report can be verified.	No change

## Georgia Published Exceptions

89.3	<p>Raw data used in the calculation of the BellSouth SQM reports are not accurately derived from or supported by their component early stage data. (Pre-Order Response Interval)</p> <p>Status - Issues remain with TAG data.</p>
122	<p>Definitions and business rules in the SQM are incomplete or inaccurate for the FOC and reject interval measurements.</p> <p>Status - EDI fix scheduled for May 2002</p>
141	<p>KPMG cannot replicate the values in the acknowledgement message timeliness SQM report for the CLEC Aggregate.</p> <p>Status - Closure in progress per 2/6/02 KPMG meeting minutes – no statement yet provided to CLECs.</p>
142	<p>KPMG could not replicate the values in the jeopardy interval and % Jeopardy SQM report.</p> <p>Status - BST response says corrected with December data. However, the problem is still not corrected. The February SQM report for dispatched UNE-P, for example, has the average interval to deliver an average advance notice of a jeopardy 6.55 days before the due date, while the actual interval from FOC date to completion date (OCI) was only 3.44 days..</p>
144	<p>KPMG cannot replicate the values in the % completions/attempts without notice metric.</p> <p>Status -BST response says code defect will be corrected with the February 2002 data.</p>
145	<p>BST incorrectly excludes data between BARNEY and NODOS stages of the PMAP process that go into the calculation of the fully mechanized and partially mechanized orders for FOC and Reject Response Completeness metric. (June 2001 data)</p> <p>Status - BST response states that due to re-coding of this measure it suggests retesting using August or later data.</p>
146	<p>KPMG cannot replicate the values for the reject interval SQM report for August 2001.</p> <p>Status - BST response that it has implemented Defect 268 with the January manual to correct the issues raised in this exception.</p>
147	<p>BST incorrectly includes multiple instances of the same Service Order Number in NODS for the Average Completion Notice Interval SQM for November 2001 data.</p> <p>Status - BST says this issue resolved with December 2001 data.</p>

148	<p>BST cannot replicate the values in the LNP reject interval SQM report for December 2001.</p> <p>Status - BST response that correction will be implemented in April 2002 release for March 2002 data.</p>
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**FLORIDA OSS TEST  
OPEN OBSERVATIONS AND EXCEPTIONS  
PERFORMANCE MEASURES**

	<b>E/O</b>	<b>Test #</b>	<b>Description</b>
			<b><i>DEFINITIONS AND STANDARDS</i></b>
1	O-150	PMR-2 (12/12/01)	Benchmark in Jeopardy Notice Interval is inconsistent with disaggregation in report.
			<b><i>METRICS CHANGE MANAGEMENT</i></b>
1	O-131	PMR-3 (10/23/01)	KPMG has discovered that BellSouth posted raw data on the PMAP website without simultaneously posting the corresponding release of the raw data user's manual.
2	E-119	PMR-3 (11/12/01)	KPMG has discovered that BST is not adhering to the documented metrics change control process for tracking changes in TeamConnection.
			<b><i>DATA INTEGRITY</i></b>
1	E-36	PMR4 (3/21/01)	BST does not properly construct the processed data used to validate FOC and rejection timeliness (former observation-6).
2	E-113	PMR-4 (10/4/01)	KPMG has found that BST does not capture xDSL transactions in flow-through measure.
3	E-114	PMR-4 (10/5/01)	BellSouth incorrectly excludes data between the BARNEY Snapshot database and NODS stages of the PMAP process for FOCs for June 2001 data.
4	E-120	PMR-4 (11/13/01)	BellSouth incorrectly excludes data between the BARNEY Snapshot database and NODS stages of the PMAP process for fully and partially mechanized orders for the % rejected service requests (non-trunks).
5	E-143	PMR-4 (02/04/02)	BST incorrectly excludes data between BARNEY and NODS stages of the PMAP process for non-mechanized orders for % rejected service requests non –trunks for June 01 data.
6	E-144	PMR-4 (02/04/02)	BST incorrectly excludes data between BARNEY and NODS stages of the PMAP process for non-mechanized orders for reject interval - non –trunks for June 01 data
7	E-145	PMR-4 (02/04/02)	BST incorrectly excludes data between BARNEY and NODS stages of the PMAP process for non-mechanized orders for FOC Timeliness - non –trunks for June 01 data

**FLORIDA OSS TEST  
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			<b><i>METRICS CALCULATION/REPLICATION</i></b>
1	E-10	PMR-5 (12/4/00)	KPMG has found that BST's metrics calculations for LNP reject intervals are inconsistent with the documented metrics calculations (formerly observation 12).
2	E-101	PMR-5 (8/24/01)	KPMG cannot replicate the values in: the Total Service Order Cycle Time report for January 2001.
3	E-153	PMR-5 (8/29/01)	KPMG cannot replicate the values in: the Provisioning LNP Total Service Order Cycle Time measurement report. (Previously observation 113)
4	E-109	PMR-5 (9/6/01)	KPMG cannot replicate the values in the Ordering Acknowledgement Message Timeliness.
5	E-152	PMR-5 (10/17/01)	KPMG cannot replicate the values in the LNP Missed Appointments Measure. (Previously Observation 125)
6	E-151	PMR-5 (11/13/01)	KPMG cannot replicate the values in the # completions/attempts without notice or with less than 24 hours notice measure. RDUM instructions insufficient. (Previously observation 139)
7	E-154	PMR-5 (12/01/01)	KPMG cannot replicate the values in the Coordinated Conversions Interval. (CLEC aggregate) (Previously observation O-142)
8	E-124	PMR-5 (12/05/01)	KPMG cannot replicate the values in the flow through report for November 2000.
9	E-135	PMR-5 (01/08/02)	KPMG cannot replicate the values in the Jeopardy Notice Interval.
	O-176	PMR 5 (03/19/02)	KPMG cannot replicate the values in the Average Completion Notice Interval.

Regional Data-Service Order Accuracy  
October 2001-January 2002

	<b>Resale</b>	<b>Oct.</b>	<b>Nov.</b>	<b>Dec.</b>	<b>January</b>
1	Residence/<10 circuits/Dispatch/GA(%)	5	65	75	74
2	Residence/<10 circuits/Non-Dispatch/GA(%)	275	140	75	75
3	Residence/>=10 circuits/Dispatch/GA(%)		16	5	11
4	Residence/>=10 circuits/Non-Dispatch/GA(%)	1			
5	Business/<10 circuits/Dispatch/GA(%)	18	70	40	125
6	Business/<10 circuits/Non-Dispatch/GA(%)	262	135	35	74
7	Business/>=10 circuits/Dispatch/GA(%)		23	17	12
8	Business/>=10 circuits/Non-Dispatch/GA(%)	2	31	28	20
9	Design (Specials)/<10 circuits/Dispatch/GA(%)	6	50	63	49
10	Design (Specials)/<10 circuits/Non-Dispatch/GA(%)	2	55	45	76
11	Design (Specials)/>=10 circuits/Dispatch/GA(%)		3	2	
12	Design (Specials)/>=10 circuits/Non-Dispatch/GA(%)		25	6	10
	<b>Total</b>	<b>571</b>	<b>613</b>	<b>391</b>	<b>526</b>

	<b>UNE</b>	<b>Oct.</b>	<b>Nov.</b>	<b>Dec.</b>	<b>Jan.</b>
13	Design (Specials)/<10 circuits/Dispatch/GA(%)	101	200	45	75
14	Design (Specials)/<10 circuits/Non-Dispatch/GA(%)	45	30	48	75
15	Design (Specials)/>=10 circuits/Dispatch/GA(%)		35	19	13
16	Design (Specials)/>=10 circuits/Non-Dispatch/GA(%)	2			
17	Loops Non-Design/<10 circuits/Dispatch/GA(%)	93	35	75	75
18	Loops Non-Design/<10 circuits/Non-Dispatch/GA(%)	289	300	100	75
19	Loops Non-Design/>=10 circuits/Dispatch/GA(%)	7	70	70	115
20	Loops Non-Design/>=10 circuits/Non-Dispatch/GA(%)	15	58	80	114
	<i>Sub-Total</i>	22	128	150	229
	<b>Total</b>	<b>552</b>	<b>728</b>	<b>437</b>	<b>542</b>

BellSouth is actually sampling less service orders than it did under the prior methodology. BellSouth issues a minimum of two service orders for every UNE LSR submitted (N and D—In many cases other orders such as directory listings, trigger orders, etc. must also be issued). Under the previous methodology BellSouth evaluated all service orders associated with the sampled population, but reported at the LSR level (Varner p. 64 bullet one). Now BellSouth has “refocused the measurement to include only sampled SOs” (Varner p.66). As the table of SOA results illustrates, the aggregate number of service orders has been drastically reduced. For example, UNE October (created under the old methodology) Total reports 552 LSRs, which should have involved over 1100 service orders. Future months all have far fewer Service Orders in the count. (This difference is exacerbated by the fact that additional products were added to the sample effective with the November report.)